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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ROWLAND MARCUS ANDRADE
Defendant

Case No.: 3:20-cr-00249-RS

**DECLARATION OF ROWLAND
MARCUS ANDRADE IN SUPPORT OF
ADMINISTRATIVE MOTION**

DECLARATION OF ROWLAND MARCUS ANDRADE IN SUPPORT OF

ADMINISTRATIVE MOTION

I, Rowland Marcus Andrade, declare as follows:

1. I am the Defendant in the above-captioned action. I make this declaration based upon my own personal knowledge of the facts and circumstances described herein, and if called as a witness, I could and would testify competently thereto.
2. My current self-surrender date is October 31, 2025, as set by the Court at sentencing. The Court previously granted this extension to allow completion of a colonoscopy scheduled for October 14, 2025.

1 3. I suffer from a chronic left-ankle injury that causes me severe pain, instability, and
2 difficulty walking. My left foot bends slightly to the right, which forces me to bear
3 weight on my ankle rather than properly through the foot, making each step painful. This
4 condition has worsened over time and was known to my former counsel.
5

6 4. On August 6, 2025, I was evaluated by orthopedic specialists for possible surgery to
7 remove or repair damaged bone and tissue in the ankle. However, the procedure was
8 deferred in favor of a non-surgical cortisone injection as a temporary measure. That
9 treatment proved ineffective, and my pain and mobility issues have continued to increase.
10

11 5. On October 8, 2025, I was informed by my medical team that my A1C level—a key
12 measure of blood glucose control—was above the surgical threshold, meaning that
13 surgery could not yet be safely performed. The elevated A1C was caused in part by
14 delays in the Department of Veterans Affairs' delivery of my prescribed insulin
15 (Novolog) during the month of August 2025.
16

17 6. On October 9, 2025, my endocrinologist placed me under a program of daily monitoring
18 through a secure mobile health application to bring my A1C level back to the required
19 range. A retest is scheduled for November 6, 2025, and based on my current progress and
20 compliance with treatment, I fully expect to pass that test. Once cleared, my doctors
21 anticipate scheduling surgery for November or December 2025, followed by a medically
22 supervised recovery period.
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1 7. I will immediately notify my counsel, the United States Attorney's Office, and the U.S.
2 Probation Department as soon as my surgery is scheduled and will provide updates
3 regarding the medical facility, surgery date, and estimated recovery time.
4

5 8. I am actively assisting my new counsel, John Pierce Law P.C., in obtaining and
6 organizing prior counsel's discovery materials and work product for use in my upcoming
7 Ninth Circuit appeal and in preparing an opposition to the government's forfeiture
8 monetary application. This case is unusually large and complex, with hundreds of docket
9 entries and extensive financial documentation. My direct participation is essential to
10 ensure accuracy and efficiency in those filings.

12 9. I have fully complied with all conditions of my bond and release, have appeared at every
13 hearing, and have remained in regular communication with Probation and counsel. I pose
14 no flight risk or danger to the community. If the Court deems it appropriate, I consent to
15 temporary release conditions, including home detention or GPS monitoring, during any
16 period of extension.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct. Executed on October 13, 2025.

23 /s/ *Rowland Andrade*

24 /s/ Rowland Marcus Andrade